

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

JUL 29 2019

David J. Bradley, Clerk

United States of America

Zachary Tyler WILLIAMSON, YOB: 1988, USC  
Jonathan Leon WILLIAMS, YOB: 1994, USC

Case No. M-19-1755-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 27, 2019 in the county of Brooks in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

21 USC 841(a)

Possession with the Intent to Distribute approximately 19.92 kilograms of heroin, a Schedule I controlled substance, and approximately 2 kilograms of methamphetamine, a Schedule II controlled substance

21 U.S.C. 846

Conspiracy to Possess with the Intent to Distribute approximately 19.92 kilograms of heroin, a Schedule I controlled substance, and approximately 2 kilograms of methamphetamine, a Schedule II controlled substance

This criminal complaint is based on these facts:

SEE ATTACHMENT A

✓ Continued on the attached sheet.

Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr.4.1,  
and probable cause found on:

Approved by

Sworn to before me and signed in my presence.

Date: July 29, 2019  
8:35 amCity and state: McAllen, Texas

Complainant's signature

TFO DEA  
Jose A. Rodriguez, DPS-CID Special Agent  
Printed name and title

Judge's signature

Hon. Peter E. Ormsby  
Printed name and title

Attachment A

On July 27, 2019, United States (US) Border Patrol (BP) Agents stationed at the Falfurrias, Texas Checkpoint conducted an immigration inspection on a GMC Sierra. USBP Agents observed the driver, later identified as ZACHARY TYLER WILLIAMSON appear nervous and showing signs of deception. While conducting immigration inspection, USBP Agents advised that K-9 Dino was alerting to the the GMC. USBP Agents directed WILLIAMSON to the secondary inspection area to further inspect the GMC. The passenger with WILLIAMSON was identified as JOHNATHAN LEON WILLIAMS.

A secondary inspection of the rear passenger area of the GMC revealed two speaker boxes. During X-Ray inspection, agents observed anomalies appearing to be bundles in the speaker boxes. A further inspection of the speaker boxes by USBP Agents revealed twenty (20) bundles containing a powdery substance weighing approximately 19.92 kilograms that tested positive for heroin, and three (3) clear plastic bundles containing a crystalline substance weighing approximately 2 kilograms that tested positive for methamphetamine. WILLIAMSON and WILLIAMS were subsequently placed under arrest for possession of a controlled substance.

Texas Department of Public Safety (DPS) Criminal Investigations Division (CID) Special Agents and Drug Enforcement Administration (DEA) Agents advised WILLIAMSON of his (WILLIAMSON) Miranda rights, to which he (WILLIAMSON) waived and agreed to be interviewed. During the interview, WILLIAMSON acknowledged to the Agents that he (WILLIAMSON) knowingly transported narcotics that he had received in the McAllen, Texas area.

Following WILLIAMSON's interview, Agents advised WILLIAMS of his Miranda rights, to which he (WILLIAMS) waived and agreed to be interviewed. WILLIAMS told Agents that he (WILLIAMS) was unaware of the narcotics contained in the speaker boxes and that he was not present when WILLIAMSON received the speaker boxes. However, prior to their (WILLIAMSON and WILLIAMS) arrest, surveillance conducted by Agents showed that WILLIAMS was present when the speaker boxes were obtained by WILLIAMSON

and conducted counter surveillance with WILLIAMSON prior to departing for Falfurrias, Texas.